



Refrigerated Prepared Foods

2001 Butterfield Road
Downers Grove, IL 60515-1049
(630) 512-1190
(630) 512-1121 Fax

Paul S. Halberstadt
Director,
Environmental Engineering

September 29, 2000

The Performance Track Information Center
Industrial Economics, Inc.
2067 Massachusetts Avenue
Cambridge, MA 02140

Subject: ConAgra Application
EPA Performance Track

Dear Julie Spyres:

Enclosed are 13 applications for multiple facilities within ConAgra for the EPA Performance Track. The facilities are the following:

- ✓ • ConAgra Beef Company, Grand Island, NE A07-0004
- ✓ • ConAgra Beef Company, Kersey, CO A08-0003 ✓
- ✓ • Swift & Company, Worthington, MN A05-0018 ✓
- ✓ • ConAgra Frozen Foods, Council Bluffs, IA A07-0005
- ✓ • Gilardi Foods, Troy, OH A05-0019 ✓
- ✓ • Gilardi Foods, Sidney, OH A05-0020 ✓
- ✓ • Gilroy Foods, Gilroy, CA A09-0013
- Gilroy Foods, Fernly, NV A09-0014
- Gilroy Foods, King City, CA A09-0015
- Gilroy Foods, Umatilla, OR A10-0005 (already processed, no complete ✓ yet)
- ✓ • Armour Swift-Eckrich, Quincy, MI A05-0021 ✓
- ✓ • Butterball Turkey (Swift-Eckrich), Wallace, NC A04-0044 ✓
- ✓ • Swift, Eckrich, Wells, MN A05-0022 ✓

On behalf of the Sustainable Development Council of ConAgra we look forward to participating in this process to demonstrate that environmental and business needs can be successfully combined. If you have any questions, please call me at 630-512-1190.

Sincerely yours,

Paul S. Halberstadt
Director, Environmental Engineering

Attachments (13)

Cc: without attachments

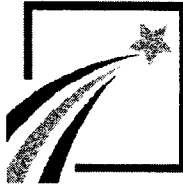
Roger Holtorf – EPA
Phil James

Don Radentz
Alan Meyer

Robb Casseday
Terry Young

Tom Stachura
Robert Harris

A09-0014



***National
Environmental
Achievement Track***

Application Form

Gilroy Foods, Geothermal Plant

Name of facility

ConAgra

Name of parent company (if any)

Exit 65, I 80 East, 17 miles east of Fernley NV 89408

Street address

P.O. Box 769 Fernley, NV 89408

Street address (continued)

Fernley, Nevada 89408

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Allen Hansen

Title Plant Manager

Phone 775-423-0575

Fax 775-423-0781

E-mail ahansen@gilroyfoods.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.



1 What do you do or make at your facility?

Dehydrated onions

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC

2034

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☒ 50-99

☐ 100-499

☐ 500-1,000

☐ More than 1,000

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

NVD986768661

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

We have a wash water discharge permit from the Nevada EPA. We sample on a monthly basis and report results quarterly

Authorization to Discharge

7 Check the appropriate box in the right-hand column.

☒ I've listed the requirements above.

☐ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

In 1998 we added a new dryer line and were able to keep wash water usage at the previous level by down sizing spray nozzle size and installing a water conservation program. We also installed more efficient heat exchangers in the new dryer units and the old dryer line when exchangers were replaced, enabling us to use less gallons of water per dry pound produced.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

Section B

Tell us about your EMS.

1 Check *yes* if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy

☒ Yes

b. Planning

☒ Yes

c. Implementation and operation

☒ Yes

d. Checking and corrective action

☒ Yes

e. Management review

☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)?

☒ Yes

3 Did this cycle include both an EMS and a compliance audit?

☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS?

☒ Yes

☒ Self-assessment

If yes, what method of EMS assessment did you use?

☐ GEMI

☒ Other

1. Hazardous training – Annually

☐ CEMP

Informal

2. File for permit renewal

3. The different aspects are part of the normal process.

☐ Third-party assessment

☐ ISO 14001 Certification

☐ Other

☐ Other

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

Section C

Tell us about your past achievements and future commitments.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Water use	15.5	Gal./Dry #	11.1	Gal./Dry #
<p>i. How is the current level an improvement over the previous level?</p> <p>Less water per dry pound produced.</p> <p>ii. How did you achieve this improvement?</p> <p>By installing more efficient heat exchangers.</p>				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Water use	2.09	Gal./Dry #	1.05	Gal./Dry #
i. How is the current level an improvement over the previous level?				
Less water per dry pound produced				
ii. How did you achieve this improvement?				
Smaller spray nozzle openings and water conservation program.				

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect? Water usage
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state ☐ Option A:
Absolute value

- this as an absolute value or in terms of units of production or output. (Quantity/Units)
- ☒ Option B:
In terms of units of production or output 11.1 Gal./Dry #
(Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output. (Quantity/Units)
- ☐ Option A:
Absolute value (Quantity/Units)
- ☒ Option B:
In terms of units of production or output 10.5 Gal./Dry #
(Quantity/Units)
- e. How will you achieve this improvement? By replacing worn heat exchangers with more efficient exchangers.

Second aspect you've selected

- a. What is the aspect? Hazardous Materials Use
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output. (Quantity/Units)
- ☒ Option A:
Absolute value 20 Gallons
(Quantity/Units)
- ☐ Option B:
In terms of units of production or output (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output. (Quantity/Units)
- ☒ Option A:
Absolute value Recycle the 20 Gallons
(Quantity/Units)
- ☐ Option B:
In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

"SafeTClean" contractor will service, maintain, and recycle, cleaning solvent.

Third aspect you've selected

a. What is the aspect?

Accidental Releases

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value 0
(Quantity/Units)

☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value 0
(Quantity/Units)

☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

Build secondary containment for fuel station.

Fourth aspect you've selected

a. What is the aspect?

Energy Use

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value (Quantity/Units)

☒ Option B:
In terms of
units of production .2/Gal./Dry #
or output (Quantity/Units)

☒ Option A:
 Absolute value 15% Reduction in BTU's
 (Quantity/Units)

☐ Option B:
 In terms of
 units of production (Quantity/Units)
 or output

Develop an active program that outlines ways and means to conserve power when not needed.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

Section D

Tell us about your public outreach and reporting.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

There have been no community concerns because we are located in a rural environment. The nearest community is 20 miles to the west of us.

2 How do you inform community members of important matters that affect them?

In contact with local fire authorities and rescue services.

3 How will you make the Achievement Track Annual Performance Report available to the public?

- ☐ Website [www.](#)
- ☐ Newspaper
- ☐ Open Houses
- ☒ Other

Copy at plant.

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/Citizen Group</i>	Fernley Volunteer Fire Department	Marty Jensen	775-575-3377
<i>State/Local Regulator</i>	Nevada EPA	Shannon Bell	775-687-4670
<i>Other community/local reference</i>	Brady Power Partners	Eric Sponiler	775-423-5800

Section E

Application and Participation Statement

On behalf of Gilroy Foods, Geothermal Plant
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date *Al Hansen* 11/7/00

Printed Name/Title Al Hansen
Plant Manager
Geothermal Plant
Facility Name Gilroy Foods, Geothermal Plant

Facility Name Gilroy Foods, Geothermal Plant

Facility Street Address Exit 65, I 80 East, 17 miles east of Fernley NV 89408
P.O. Box 769 Fernley, NV 89408

Facility ID Numbers 5444